

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEZ,)
PENNY POPE, OSCAR ORTIZ, KOBY)
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY)
HERMAN, EVELYN BRICKNER, GORDON)
BENJAMIN, KEN GANDY, LEAGUE OF)
UNITED LATIN AMERICAN CITIZENS)
(LULAC), AND DALLAS COUNTY, TEXAS,)

Plaintiffs,

v.

RICK PERRY, Governor of Texas; and JOHN)
STEEN, Texas Secretary of State,)

Defendants.

UNITED STATES OF AMERICA,)

Plaintiffs,

TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND, IMANI CLARK,)
AURICA WASHINGTON, CRYSTAL)
OWENS, AND MICHELLE BESSIAKE,)

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC)
COUNTY JUDGES AND COUNTY)
COMMISSIONERS, HIDALGO COUNTY,)
AND MARIA LONGORIA BENAVIDES,)

Plaintiff-Intervenors,

v.

STATE OF TEXAS, JOHN STEEN, in his)
official capacity as Texas Secretary of State;)
and STEVE McCRAW, in his official capacity)
as Director of the Texas Department of Public)

CIVIL ACTION NO.

2:13-CV-193 (NGR)

[Lead case]

CIVIL ACTION NO.

2:13-CV-263 (NGR)

[Consolidated case]

Safety,)	
<i>Defendants.</i>)	
)	
TEXAS STATE CONFERENCE OF NAACP)	
BRANCHES; and the MEXICAN)	
AMERICAN LEGISLATIVE CAUCUS OF)	
THE TEXAS HOUSE OF)	
REPRESENTATIVES,)	
<i>Plaintiffs,</i>)	
v.)	CIVIL ACTION NO.
)	2:13-CV-291 (NGR)
JOHN STEEN, in his official capacity as)	[Consolidated case]
Secretary of State of Texas; and STEVE)	
McCRAW, in his official capacity as Director)	
of the Texas Department of Public Safety,)	
<i>Defendants.</i>)	
)	
BELINDA ORTIZ, LENARD TAYLOR,)	
EULALIO MENDEZ JR., LIONEL)	
ESTRADA; ESTELA GARCIA ESPINOSA,)	
ROXANNE HERNANDEZ, LYDIA LARA,)	
MARGARITO MARTINEZ LARA,)	
MAXIMINA MARTINEZ LARA, AND)	
<i>LA UNION DEL PUEBLO ENTERO, INC.</i>)	
<i>Plaintiffs,</i>)	
v.)	
)	CIVIL ACTION NO.
STATE OF TEXAS; JOHN STEEN, in his)	2:13-CV-348 (NGR)
Official capacity as Texas Secretary of State;)	[Consolidated case]
And STEVE McCRAW, in his official capacity)	
As Director of the Texas Department of)	
Public Safety,)	
<i>Defendants.</i>)	

**DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF
LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC)**

To: **League of United Latin American Citizens (LULAC)**, by and through its attorneys of record, Chad W. Dunn, Brazil & Dunn, 4201 Cypress Creek Parkway, Suite 530, Houston, Texas 77068; J. Gerald Herbert, Campaign

Legal Center, 215 E Street, NE, Washington, DC 20002; Neil G. Baron, Law Office of Neil G. Baron, 914 FM 517 W, Suite 242, Dickinson, Texas 77539; Armand G. Derfner, Derfner, Altman & Wilborn, LLC, P.O. Box 600, Charleston, S.C. 29402; Luis Roberto Vera, Jr., LULAC National General Counsel, The Law Offices of Luis Vera Jr., and Associates, 1325 Riverview Towers, 111 Soledad, San Antonio, Texas 78205-2260.

Pursuant to the Federal Rules of Civil Procedure, you are directed to answer the following set of interrogatories fully, in writing and under oath, based on all information reasonably available to you or your attorney at the time your response is made. Please serve your responses and any objections on the undersigned attorneys within thirty (30) days of service of these interrogatories. These interrogatories are continuing in nature as provided by Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The following terms have the following meanings, unless the context requires otherwise:

1. Party or Parties. The term “plaintiff” or “defendant” as well as a party’s full or abbreviated name or a pronoun referring to a party, means the party and, when applicable, his agents, representatives, officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

2. Document. The term “document” means information that is fixed in a tangible medium, such as paper, or electronically stored information. It includes, but is not limited to, writings, drawings, films, charts, photographs, notices, memoranda, diaries, minutes, correspondence, books, journals, ledgers, reports, worksheets, notes, printed e-mails, letters, abstracts, audits, charts, checks, diagrams, drafts, instructions, lists, logs, resumes, and summaries.

a. Electronically Stored Information. The term “electronically stored information” means electronic information that is stored in a medium from which it

can be retrieved and examined. It includes, but is not limited to, all electronic files that can be retrieved from electronic storage.

1) “Electronic file” includes, but is not limited to, the following: electronic documents; e-mail messages and files; deleted files; temporary files; and metadata.

2) “Electronic information system” refers to a computer system or network that contains electronic files and electronic storage.

3) “Electronic storage” refers to electronic files contained on magnetic, optical, or other storage media, such as hard drives, flash drives, DVDs, CDs, tapes, cartridges, floppy diskettes, smart cards, integrated-circuit cards (e.g., SIM cards).

3. Tangible thing. The term “tangible thing” means a physical object that is not a document.

4. SB 14. The term “SB 14” refers to Texas Senate Bill 14, 82d Leg., R.S., ch 123, § 3, 2011 Tex. Gen. Laws 619, including all companion or predecessor bills filed during previous sessions, whether regular or special, of the Texas Legislature, and all alternative bills or proposals, whether filed or not, relating to the use of photographic identification for voting in the state of Texas. However, where SB14 is quoted from an allegation in the Federal Complaint, the term “SB 14” has the meaning ascribed to it in the Federal Complaint.

5. And & or. The connectives “and” and “or” should be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

6. Person. The term “person” means any natural person, a business, a legal or governmental entity, or an association.

7. You & your. The terms “you” and “your” means LULAC, and its members, agents, representatives, attorneys, experts, and other persons acting or purporting to act on behalf of it. “You” and “your” specifically includes any individual member of LULAC, acting in his/her capacity as an individual member of LULAC.

8. LULAC. The term “LULAC” means League of United Latin American Citizens.

INTERROGATORY NO. 1

Please identify and describe in detail all facts that support your claim that SB 14, as enacted by the State of Texas' 82nd Legislature, was enacted with a discriminatory purpose and intent. This interrogatory includes a request to identify any documents or tangible things you intend to rely on at trial which have not been, or will not be, produced in response to any Request for Production propounded on you or any other party by Defendants.

RESPONSE:

INTERROGATORY NO. 2

Please identify and describe in detail all facts that support your claim that SB 14, as enacted by the State of Texas' 82nd Legislature, results in denying and abridging the right to vote on account of race and language minority status. This interrogatory includes a request to identify any documents or tangible things you intend to rely on at trial which have not been, or will not be, produced in response to any Request for Production propounded on you or any other party by Defendants.

RESPONSE:

Dated: March 28, 2014

Respectfully submitted.

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

JONATHAN F. MITCHELL
Solicitor General

J. REED CLAY, JR.
Special Assistant and Senior Counsel
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/s/ John B. Scott
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COUNSEL FOR THE STATE OF TEXAS,
RICK PERRY, THE TEXAS SECRETARY
OF STATE, and STEVE MCCRAW

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being served by electronic mail on March 28, 2014, to all counsel of record.

/s/ John B. Scott
JOHN B. SCOTT